

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:15-CR-148
vs.	:	
	:	
WILLIAM M. APOSTELOS,	:	Judge Thomas Rose
	:	
Defendant.	:	

UNOPPOSED MOTION TO MODIFY BOND

Now comes the Defendant, WILLIAM M. APOSTELOS, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of bond to allow United States Pretrial Services to approve a schedule of visitation for Mr. Apostelos to visit his father on December 27, 2016. Mr. Apostelos' father lives in Lagrange, Ohio, and Mr. Apostelos asks that Pretrial Services be permitted to approve a schedule of visitation that takes into account the 7-8 hours of round trip driving time to make this visit.

Assistant United States Attorney Brent Tabacchi and United States Pretrial Officer Kelvin
Gover have no objection to this request.

Respectfully submitted,

DEBORAH L. WILLIAMS,
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins
F. Arthur Mullins (0080483)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Brent Tabacchi, Assistant United States Attorney, by electronic mail on the date same was filed.

s/F. Arthur Mullins
F. Arthur Mullins

Attorney for Defendant
William M. Apostelos